

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

344 PROVIDENCE ROAD REALTY)
TRUST, RICHARD J. WUNSCHEL,)
and NAUTILUS INSURANCE COMPANY,)
Plaintiffs,)
)
v.)
AMERICAN SAFETY RISK RETENTION)
GROUP, INC. and ARCHITECTURAL)
DELEADING, INC.,)
Defendants.)

CIVIL ACTION NO. 04-40197-FDS

ASSENTED-TO MOTION OF DEFENDANT,
ARCHITECTURAL DELEADING, INC., TO EXTEND
THE DEADLINE FOR WRITTEN DISCOVERY

Now comes the Defendant, Architectural Deleading, Inc. ("ADI"), and respectfully requests that this Court extend the deadline for responding to Phase I requests for production of documents and interrogatories, up to and including July 29, 2005. As grounds for this motion, ADI states as follows:

1. On March 29, 2005, this Court issued a Scheduling Order in this matter which provided for a timetable for discovery. Specifically, under Phase 1 of the Scheduling Order, responses to initial requests for production of documents were to be served by June 20, 2005, and answers to initial interrogatories were to be served by July 8, 2005.
2. On June 3, 2005, the Plaintiffs in this matter, 344 Providence Road Realty Trust, Richard J. Wunschel, and Nautilus Insurance Co. (or, collectively, the "Plaintiffs"), served ADI with an initial request for production of documents and a first set of interrogatories. Under the Federal Rules of Civil Procedure, ADI's response to the document requests and interrogatories is due on July 5, 2005.

3. ADI respectfully requests an extension for the deadline for Phase 1 initial written discovery in this matter up to and including July 29, 2005. As grounds for this motion, ADI states that it must conduct a review of voluminous documents in order to respond to Plaintiffs' requests. This review of voluminous documents, coupled with vacation schedules and the upcoming holiday, necessitates a brief extension of the discovery period.

4. Counsel for ADI and Plaintiffs have conferred in this matter, and Plaintiffs have assented to this motion. The parties continue to anticipate at this time that Phase I discovery will be completed by the September 30, 2005 deadline previously set by the Scheduling Order.

WHEREFORE, ADI respectfully requests that this Court allow an extension of the deadline for ADI to respond to Phase 1 requests for the production of documents and interrogatories in this matter, up to and including July 29, 2005.

Respectfully submitted,
ARCHITECTURAL DELEADING, INC.

By Its Attorneys,
MORRISON MAHONEY LLP


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Assented to,
344 PROVIDENCE ROAD REALTY TRUST,
RICHARD J. WUNSCHEL, and
NAUTILUS INSURANCE CO.

By Their Attorneys,
SMITH & DUGGAN LLP

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Date: June 20, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of June, 2005, I caused copies of the foregoing document to be served on counsel to the parties to this action by first class mail.

Alethea O'Donnell
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